

1 John D. Fiero (CA Bar No. 136557)
2 [PRO HAC VICE PENDING]
3 Gail S. Greenwood (CA Bar No. 169939)
4 [PRO HAC VICE PENDING]
5 PACHULSKI STANG ZIEHL
6 & JONES LLP
7 150 California Street, 15th Floor
8 San Francisco, CA 94111-4500
9 Telephone: 415/263-7000
Facsimile: 415/263-7010
E-mail: jfiero@pszjlaw.com
ggreenwood@pszjlaw.com
[Proposed] Special Litigation Counsel to
Kavita Gupta, Chapter 11 Trustee

Electronically filed on: December 3rd, 2020

10 GHANDI DEETER BLACKHAM
11 SHARA L. LARSON, ESQ.
Nevada Bar No. 7786
12 Email: shara@ghandilaw.com
725 S. 8th St., Suite 100
13 Las Vegas, Nevada 89101
14 Tel: (702) 878-1115
15 [Proposed] Local Counsel for
Special Litigation Counsel to Kavita Gupta,
Chapter 11 Trustee

17 UNITED STATES BANKRUPTCY COURT
18 FOR THE DISTRICT OF NEVADA

19 In re:
20 DESERT OASIS APARTMENTS, LLC,
21 Debtor.

Chapter 11
Case No.: BK-S-18-12456-GS
Hearing Date: December 10, 2020
Hearing Time: 9:30 a.m.
Hearing Place: Telephonic, GS Courtroom

25 **SUPPLEMENT TO VERIFIED STATEMENT OF SHARA L. LARSON, ESQ. IN
26 SUPPORT OF APPLICATION OF THE CHAPTER 11 TRUSTEE FOR ORDER
APPROVING EMPLOYMENT OF GHANDI DEETER BLACKHAM AS LOCAL
27 COUNSEL FOR PACHULSKI STANG ZIEHL & JONES LLP
AS PROPOSED SPECIAL LITIGATION COUNSEL**

1 I, Shara L. Larson, declare as follows:

2 1. I am an Attorney with Ghandi Deeter Blackham ("GDB" or the "Firm"). I am
3 an attorney-at-law, duly admitted and in good standing to practice in the State of Nevada, as
4 well as the United States District Court for the District of Nevada.

5 2. I submit this Supplemental Declaration in connection with the Application of
6 Kavita Gupta, chapter 11 trustee (the "Trustee")¹ of the Debtor, to retain GDB as local counsel
7 for special litigation counsel to the Trustee filed on or about October 27, 2020 [ECF No. 190]
8 (the "GDB Application") and to supplement the disclosures required under the Bankruptcy
9 Code.

10 3. Except as otherwise stated, all facts contained within this Supplemental
11 Declaration are based upon personal knowledge (my own or that gathered from others that work
12 under my supervision), and my review of relevant documents. If called upon to testify, I would
13 testify to the facts set forth in this Supplemental Declaration.

14 4. On or about November 25, 2020, the United States Trustee for Region 17
15 ("UST") filed an objection to the GDB Application. The UST requested an more expansive
16 disclosure as to GDB's disinterestedness.

17 5. GDB has made the following additional investigation of potential adverse
18 interests prior to submitting this Supplemental Declaration. GDB has run through its conflict
19 database all parties requesting special notice and all parties listed on creditor mailing matrix in
20 all of the "Affiliated Cases" as defined in the UST's Objection.

21 6. GDB has undertaken a full and thorough review of its computer database which
22 contains the names of clients and other parties interested in particular matters. GDB requires
23 all of its professionals, before accepting the representation of a new client, or the representation
24 of an existing client in a new matter, to perform a conflict check through GDB's database and
25 to enter into that database conflict information regarding new clients or new matters. Thus, a
26

27 28 1 Capitalized terms not defined herein have the meanings set forth in the accompanying Application.

review of said computerized database should reveal any and all actual or potential conflicts of interest with respect to any given representation.

7. Insofar as I have been able to ascertain and based on the investigation and disclosure described above, GDB has no connection with the Debtor, its creditors, any other party in interest herein, its respective attorneys or professionals, the United States Trustee or any person employed in the Office of the United States Trustee. The Firm has not previously represented the Trustee in any cases. To the best of my knowledge, GDB does not represent any entity having an adverse interest to the estate. Neither GDB, nor any associate, of counsel or partner of GDB has an interest materially adverse to the interest of the Debtor's estate or of any class of creditors, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason. Neither GDB, nor any of its partners, of counsel or associates represent any interest adverse to that of the Debtor or its creditors in the matters on which my firm is to be retained.

8. GDB acknowledges that GDB has a continuing duty to supplement disclosures required pursuant to Federal Rules of Bankruptcy Procedure 2014 and 2016. Additionally, GDB acknowledges that GDB has a fiduciary duty to the Chapter 11 Trustee.

9. GDB also understands and acknowledges that the provision that “Client agrees to pay any fees and costs that are incurred by Attorney to collect fees, costs, or expenses from Client, including reasonable attorney's fees.” will be deemed stricken from the GDB engagement agreement with the Chapter 11 Trustee and will not be enforced. To be clear, striking this provision will not prohibit GDB from including time and costs incurred in the preparation of fee applications in the bankruptcy court.

To the best of my knowledge, and after conducting or supervising the investigation described above, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of December 2020, in Las Vegas, Nevada.

/s/ Shara L. Larson
SHARA L. LARSON, ESQ.

CERTIFICATE OF SERVICE

On this 3rd day of December 2020, I served the following document(s):

SUPPLEMENT TO VERIFIED STATEMENT OF SHARA L. LARSON, ESQ. IN SUPPORT OF APPLICATION OF THE CHAPTER 11 TRUSTEE FOR ORDER APPROVING EMPLOYMENT OF GHANDI DEETER BLACKHAM AS LOCAL COUNSEL FOR PACHULSKI STANG ZIEHL & JONES LLP AS PROPOSED SPECIAL LITIGATION COUNSEL

I served the above-named document(s) by the following means to the persons listed below
(check all that apply):

X a. **ECF System** (*You must attach the “Notice of Electronic Filing,” or list all persons and addresses and attach additional paper if necessary.*)

ANTHONY W. AUSTIN on behalf of Creditor THE NORTHERN TRUST COMPANY
aaustin@fclaw.com, gkbacon@fclaw.com

DAWN M. CICA on behalf of Defendant DAVID GAFFIN
dcica@carlyoncica.com,
nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com

DAWN M. CJCA on behalf of Defendant HOWARD BULLOCH

dcica@carlyoncica.com,
nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com

DAWN M. CICA on behalf of Interested Party DAVID GAFFIN

dcica@carlyoncica.com,
nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com

DAWN M. CICA on behalf of Interested Party HOWARD BULLOCH

dcica@carlyoncica.com,
nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;
oncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com

KEVIN W COLEMAN on behalf of Plaintiff KAVITA GUPTA
kcoleman@nutihart.com, nwhite@nutihart.com

KEVIN W COLEMAN on behalf of Trustee KAVITA GUPTA
kcoleman@nutihart.com, nwhite@nutihart.com

JAMIE P. DREHER on behalf of Petitioning Creditor BRADLEY J. BUSBIN, AS TRUSTEE

1 OF THE GONZALES CHARITABLE REMAINDER UNITRUST ONE
2 jdreher@downeybrand.com, mfrazier@downeybrand.com

3 KIMBERLY S. FINEMAN on behalf of Trustee KAVITA GUPTA
4 kfineman@nutihart.com

5 EDMUND GEE on behalf of U.S. Trustee U.S. TRUSTEE - LV - 11, 11
6 edmund.gee@usdoj.gov

7 TALITHA B. GRAY KOZLOWSKI on behalf of Plaintiff KAVITA GUPTA
8 tgray@gtg.legal, bknottices@gtg.legal

9 TALITHA B. GRAY KOZLOWSKI on behalf of Trustee KAVITA GUPTA
10 tgray@gtg.legal, bknottices@gtg.legal

11 STEVEN T GUBNER on behalf of Interested Party JEFFREY I. GOLDEN, TRUSTEE OF
12 DESERT LAND
13 ssubner@bg.law, ecf@bg.law;rsokol@bg.law

14 JUSTIN J. HENDERSON on behalf of Creditor JUNIPER LOAN SERVICING
15 CORPORATION
16 jhenderson@lrrc.com, cscruggs@lrrc.com,justin-henderson-8499@ecf.pacerpro.com

17 TRACY M. O'STEEN on behalf of Defendant 10181 PARK RUN LLC
18 tosteen@carlyoncica.com,
19 crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

20 TRACY M. O'STEEN on behalf of Defendant COMPASS INVESTMENTS LLC
21 tosteen@carlyoncica.com,
22 crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

23 TRACY M. O'STEEN on behalf of Defendant THE RANCH LLC
24 tosteen@carlyoncica.com,
25 crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

26 TRACY M. O'STEEN on behalf of Defendant DAVID GAFFIN
27 tosteen@carlyoncica.com,
28 crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Defendant HOWARD BULLOCH
tosteen@carlyoncica.com,
crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Interested Party CITATION FINANCIAL, LLC,
tosteen@carlyoncica.com,
crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

1 TRACY M. O'STEEN on behalf of Interested Party COMPASS INVESTMENTS
2 HOLDINGS, LLC
3 tosteen@carlyoncica.com,
4 crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

5 TRACY M. O'STEEN on behalf of Interested Party DESERT LAND LOAN ACQUISITION,
6 LLC
7 tosteen@carlyoncica.com,
8 crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

9 TRACY M. O'STEEN on behalf of Interested Party DAVID GAFFIN
10 tosteen@carlyoncica.com,
11 crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

12 TRACY M. O'STEEN on behalf of Interested Party HOWARD BULLOCH
13 tosteen@carlyoncica.com,
14 crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

15 ERIC R OLSEN on behalf of Interested Party WASH MULTIFAMILY LAUNDRY
16 SYSTEMS, LLC
17 eolsen@gtg.legal

18 LENARD E. SCHWARTZER on behalf of Debtor DESERT OASIS APARTMENTS, LLC
19 bkfilings@s-mlaw.com

20 U.S. TRUSTEE - LV - 11, 11
21 USTPRegion17.lv.ecf@usdoj.gov

22 MARK M. WEISENMILLER on behalf of Interested Party WASH MULTIFAMILY
LAUNDRY SYSTEMS, LLC
mweisenmiller@gtg.legal, bknotices@gtg.legal

23 MARK WRAY on behalf of Petitioning Creditor BRADLEY J. BUSBIN, AS TRUSTEE OF
24 THE GONZALES CHARITABLE REMAINDER UNITRUST ONE
25 mwrays@markwraylaw.com, tmoore@markwraylaw.com

26 b. **United States mail, postage fully prepaid** (*List all persons and
addresses. Attach additional paper if necessary.*)

27 c. **Personal Service** (*List persons and addresses. Attach additional paper
if necessary.*)

28 I personally delivered the document(s) to the persons at these addresses:

1 _____ For a party represented by an attorney, delivery was made by handing
2 the document(s) at the attorney's office with a clerk or other person in charge, or if no
3 one is in charge by leaving the document(s) in a conspicuous place in the office.

4 _____ For a party, delivery was made by handing the document(s) to the party
5 or by leaving the document(s) at the person's dwelling house or usual place of abode
6 with someone of suitable age and discretion residing there.

7 **d. By direct email (as opposed to through the ECF System)** (*List persons*
8 *and email addresses. Attach additional paper if necessary.*)

9 Based upon the written agreement of the parties to accept service by email or a court
10 order, I caused the document(s) to be sent to the persons at the email addresses listed
11 below. I did not receive, within a reasonable time after the transmission, any electronic
12 message or other indication that the transmission was unsuccessful.

13 _____ **e. By fax transmission** (*List persons and fax numbers. Attach additional*
14 *paper if necessary.*)

15 Based upon the written agreement of the parties to accept service by fax transmission
16 or a court order, I faxed the document(s) to the persons at the fax numbers listed below.
17 No error was reported by the fax machine that I used. A copy of the record of the fax
18 transmission is attached.

19 _____ **f. By messenger** (*List persons and addresses. Attach additional paper if*
20 *necessary.*)

21 I served the document(s) by placing them in an envelope or package addressed to the
22 persons at the addresses listed below and providing them to a messenger for service. (A
23 declaration by the messenger must be attached to this Certificate of Service.)

24 **I declare under penalty of perjury that the foregoing is true and correct.**

25 Dated this 3rd day of December 2020.

26 **GHANDI DEETER BLACKHAM**

27 Laura Schnetzer

28 /s/ Laura Schnetzer

Employee of Ghandi Deeter Blackham